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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY****REGION 5****EMERGENCY RESPONSE BRANCH 1****25089 CENTER RIDGE ROAD****WESTLAKE, OH 44145****19 SEP 2012****MEMORANDUM**

**SUBJECT:** **ACTION MEMORANDUM:** Request for an Time-Critical Removal Action and Exemption from the \$2 million Statutory Limit at the Taylor Industrial Services Site, Mt. Gilead, Morrow County, Ohio (Site ID # C5G6)

**FROM:** Stephen Wolfe, OSC  
Emergency Response Branch 1, Section 1

**THRU:** Jason H. El-Zein, Chief  
Emergency Response Branch 1

**TO:** Richard C. Karl, Director  
Superfund Division

**I. PURPOSE**

The purpose of this memorandum is to request and document your approval to expend up to \$2,410,176 and grant an exemption from the \$2 million statutory limit in order to conduct a time-critical removal action at the Taylor Industrial Services Site (the Site) located in Mt. Gilead, Morrow County, Ohio. The presence of hazardous substances as defined by 40 C.F.R. Part 302.4 has been documented by the Ohio Environmental Protection Agency (Ohio EPA) during a site assessment performed in April 2012. The time-critical removal action proposed herein will mitigate the threat to public health, welfare, and the environment posed by the release of hazardous substances, or pollutants or contaminants to the environment.

The proposed removal action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances, pollutants and/or contaminants. The uncontrolled conditions of the hazardous substances, pollutants and/or contaminants present at the Site require that this action be classified as a time-critical removal action. The project will require approximately 90 working days to complete.

There are no nationally significant or precedent setting issues associated with the Taylor Industrial Services Site and the Site is not on the National Priorities List (NPL).

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## **II. SITE CONDITIONS AND BACKGROUND**

CERCLIS ID: OHN000510780

State ID: OHD071641633

Category: Time-Critical Removal Action

Between 2003 and 2010, Taylor's Industrial Services, LLC (Taylor) produced and supplied metal extrusion systems, injection molding machines, die casting equipment and components for wind turbines at the Site after Taylor's Property Management, LLC (Taylor's Property) purchased the business from HPM Corporation (HPM).<sup>1</sup> Previously, HPM's primary business activity at the location was the manufacture of hydraulic presses, injection molding machines and extrusion and die cast machines. Taylor's Property purchased the Site in 2003 after HPM filed for bankruptcy. Taylor later ran a heavy towing business (flatbeds, etc.) out of the Site location in addition to its manufacturing operations mentioned above.

In January 2010, Taylor closed its business and in March 2011, Huntington Bank held a public auction of Taylor's machinery and intellectual property to recoup some of the monies it had loaned to Taylor. In May 2010, Ohio EPA performed an inspection at the Site and noted that the facility was generally vacant, but contained a variety of drums. Ohio EPA attempted to contact Taylor to arrange for a response to the contamination on-Site, but failed to make contact. Thereafter, in April 2012, Ohio EPA obtained a warrant and legally entered the Site property for an assessment of conditions and collection of samples.

Ohio EPA inspected the facility and documented the presence of approximately 200 55-gallon drums, 500 smaller containers, totes, and storage tanks containing unknown substances (many of the containers were marked with flammable liquid labels). In addition, machine pits located inside the building were filled with a petroleum substance. A permitted discharge-system that empties to a nearby creek was located on-Site and it is unknown at this time whether the system is connected to the pits or underground storage tanks located at the Site. An area at the ground's surface near some underground storage tanks was bare of vegetation which suggested that material had leaked from the tanks. Finally, the state discovered an area on the property that had been used to "landfarm" soils that had been previously contaminated with solvents from a spill in the past. Landfarming is the process whereby soils contaminated with solvents are spread in an area to allow solvents to volatilize into the atmosphere from the soils.

Analytical data from the samples collected revealed the presence of chlorinated oils, polychlorinated biphenyl (PCB) oil, xylene, benzene, and other solvents. A sample of the bare patch of ground indicated that leachable benzene was present in the soils. On April 23, 2012, based on its inspection results and analytical data, Ohio EPA requested that U.S. EPA perform a removal action at the Site.

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<sup>1</sup> Taylor's Industrial Services, LLC and Taylor's Property Management, LLC were both operated and controlled by the same individual, Christopher A. Filos.

## **A. Site Description**

### **1. Removal Site Evaluation**

On May 10, 2012, Stephen Wolfe, the U.S. EPA On-Scene Coordinator (OSC), met with representatives from Ohio EPA and Morrow County to conduct a walkthrough of the Site to document site conditions and determine if a removal action was appropriate. The OSC and representatives from Ohio EPA conducted a visual assessment of Site conditions.

During the walkthrough of the Site, U.S. EPA and Ohio EPA observed that the machine pits located inside the building were full (approximately 4 feet deep) with a petroleum substance. Analytical data from Ohio EPA's April 2012 sampling event indicated that all the oil in the pit was chlorinated, possibly due to mixing with solvents.

Approximately two hundred 55-gallon drums (many with labels marked "flammable liquid") were present throughout the Site. Some of those labels indicated that the drums contained xylene. The majority of the drums were stored in what appeared to be a chemical storage room; however, there were drums scattered throughout the facility as well as outside the building. Approximately five hundred smaller containers (less than 5-gallons) were also discovered at the site. Several electrical transformers with stickers reading "contains PCB oil" were also present inside as well as outside the building.

Several underground storage tanks found on-Site were inspected and found to be filled with a similar petroleum product as was found in the pits (according to analytical data from Ohio EPA's sampling event). The presence of several above-ground storage tanks was also documented as well as a bare patch of ground where benzene had apparently leaked from some of the underground storage tanks.

Inspection of Site security revealed that although the main portion of the property had a chain link fence surrounding it, the fence was easily breached due to gaps at the front, side and rear gates and the lack of a lock on a gate in the front. Doors to the building were unlocked. The Morrow County Prosecutor's office had provided Site security until late 2011 when there was no longer any funding to maintain security services. The rear portion of the property is not fenced and is open to trespassers as evidenced by trails made by four wheel motorcycles (several people were observed riding in the back of the Site property during the walk through).

U.S. EPA requested that an investigator from the Morrow County Prosecutor's Office routinely visit the Site during normal work hours and inform the OSC if any substances were draining from the Site to the nearby creek. The Morrow County investigator indicated that he would visit the Site approximately twice a week.

Since Ohio EPA collected samples recently and used standard acceptable testing protocols, U.S. EPA did not conduct additional sampling/analysis of potential hazardous substances on-site.

## **2. Physical location**

The Site is located at 820 West Marion Road, Mt. Gilead, Morrow County, Ohio, 43338. The geographical coordinates for the Site are 40° 33' 10.64" North latitude and -82° 51' 17.27" West longitude. The Site where the release occurred is located in a mixed industrial, commercial and residential area.

## **3. Site characteristics**

The site is approximately 80 acres in size. Approximately 15 acres of the property is enclosed by a chain link fence and contains an approximate 300,000-square-foot building. Railroad tracks run along the northern portion of the property with a rail spur entering the fenced-in area. There is open farmland beyond the tracks. Residential properties are located approximately 0.1 miles to the east and west and a residential neighborhood borders the Site on the south on West Marion Road. A small creek flows around the fenced perimeter of the property and the creek eventually discharges to the Olentangy River.

## **4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant**

The release or threatened release into the environment of a hazardous substance, pollutant or contaminant occurred at the Site property and was discovered after the Site was abandoned by Taylor and its facility machinery was sold at auction. Analytical results from the samples collected by Ohio EPA indicated that hazardous substances including, but not limited to benzene, chlorinated oils, xylene, PCBs, and vinyl chloride were released on-Site. Further, sampling indicated that the waste was characteristically defined as hazardous waste (due to corrosivity, ignitability, and TCLP values for trichlorobenzene and vinyl chloride).

## **5. NPL status**

There are no nationally significant or precedent setting issues associated with this Site and the Site is not on the National Priorities List (NPL).

## **6. Maps, pictures and other graphic representations**

Figure A-1 Photo Log is included as an attachment.

## **7. Environmental Justice Analysis**

The area surrounding the Taylor site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to U.S.EPA Region 5. The Site is in a census tract with a score of 7. Therefore, Region 5 does not consider this to be a high-priority potential EJ area of

concern. Please refer to the attached EJ analysis for additional information (Attachment 1).

## **B. Other Actions to Date**

### **1. Previous actions**

The Ohio EPA first noticed possible problems at the Site in May 2010. After it was unsuccessful at gaining voluntary access to the Site for inspection, Ohio EPA pursued and obtained a state administrative warrant to inspect and collect samples at the property in April 2012.

The Morrow County Prosecutor's Office provided security services at the Site until late 2011 when there were no longer any funds to maintain the services.

### **2. Current actions**

None.

## **C. State and Local Authorities' Roles**

### **1. State and local actions to date**

Ohio EPA issued a state Notice of Violation as well as a Director's Final Findings and Order in November 2008 to Taylor, the facility's owner, for improper hazardous waste handling procedures. Ohio EPA returned to the Site in May 2010 for a follow-up inspection and found the building generally abandoned, but containing uncontrolled waste. Ohio EPA attempted to contact Taylor's owner, but was unsuccessful and obtained an administrative warrant in order to fully assess the Site. A site assessment was performed by Ohio EPA in April 2012.

The Morrow County Prosecutor's Office provided 24- hour Site security until late 2011 when it no longer had the funding to maintain the services. Currently, officers from the Morrow County Prosecutor's Office inspect the Site on a regular basis to ensure that no changes have occurred such as leaks of the storage tanks.

### **2. Potential for continued State/local response**

Ohio EPA has indicated that it does not have the resources to address the abandoned waste at the Site. Local authorities will inspect the Site on a regular basis to inform the U.S. EPA if Site conditions change. To date, all of U.S. EPA's attempts at contacting the facility owner have been unsuccessful.

which are all characteristic for hazardous waste (D002, D001, D021, and D043 respectively). In addition, drums labeled "Xylene" were found on-Site.

The hazardous substances listed above pose threats to the animals that may inhabit the affected areas, in addition to threatening human health. The actual or potential human health effects of benzene, chlorobenzene, dichlorobenzene, trichlorobenzene, PCBs, vinyl chloride, and Xylene are described below (as compiled from the Agency for Toxic Substances and Disease Registry ToxFAQs [[www.atsdr.cdc.gov/toxfaq/index/asp](http://www.atsdr.cdc.gov/toxfaq/index/asp)]).

### **Benzene**

The major effect of long-term exposure to benzene is on the blood. Benzene causes harm to bone marrow and can cause a decrease in red blood cells leading to anemia. It can also cause excessive bleeding and can affect the immune system. The Department of Health and Human Services has classified benzene as a carcinogen.

### **Chlorobenzene**

Workers exposed to chlorobenzene in the air complained of headaches, nausea, sleepiness, numbness, and vomiting. Animal studies indicate that the liver, kidney, and central nervous system are affected by exposure to chlorobenzene. The EPA has determined that chlorobenzene is not classifiable as to human carcinogenicity based on inadequate evidence in both humans and animals.

### **Dichlorobenzene**

Inhaling the vapor or dust of dichlorobenzene can irritate the respiratory tract system. It can cause difficulty breathing as well as liver problems. The Department of Health and Human Services has determined that dichlorobenzene may reasonably be anticipated to be a carcinogen.

### **Trichlorobenzene**

There is virtually no information available regarding the health effects of trichlorobenzenes in humans. However, based on animal studies, it is reasonable to predict that humans exposed to trichlorobenzenes may develop liver problems.

### **Poly-chlorinated Biphenyls**

Health effects associated with exposure to PCBs include acne-like skin conditions in adults and neurobehavioral and immunological changes in children. PCBs are known to cause cancer in animals. The Department of Health and Human Services has concluded that PCBs may reasonably be anticipated to be a carcinogen.

### **III. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

The conditions at the Taylor Industrial Services Site present a substantial threat to the public health or welfare, and the environment, and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. § 300.415(b)(2). These criteria include, but are not limited to, the following:

#### **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

The nearest residential properties are located less than 0.1 miles away from the Site and there is evidence of human trespass as well as animal tracks throughout the Site. Historical information suggests that soil contaminated with solvents may have been landfarmed on the property. The rear portion of the property is unfenced and there is evidence (trails) that the local populace use it for recreational purposes such as riding four-wheeled motorcycles (witnessed on the day of the walk-through). In addition, shotgun shells were found on the property during the Ohio EPA Site assessment.

Animal tracks were noted during the Site walk-through and there is a drainage system that leads to a nearby creek. It is unknown whether the drainage system is connected to the interior pits that are filled with contaminated oil. Distressed vegetation is evident near underground storage tanks and benzene was detected in Site soils. Staining is evident on concrete pads where drums are stored which indicates that liquid is leaking from the drums.

#### **Hazardous substances, pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;**

Waste containing hazardous substances, pollutants, or contaminants is currently stored at an abandoned facility with evidence of trespass and no security. Wastes are stored in approximately two hundred 55-gallon drums, five hundred smaller containers (less than 5-gallon) up to twenty-five totes, several above-ground storage tanks and several underground storage tanks. In addition, there are interior machine pits full of chlorinated oils (up to 4 feet deep) which are open to the air. The majority of the wastes are contained inside an unlocked building. Drums and tanks are located throughout the property, however, both inside and outside the building.

Ohio EPA's analytical results of samples taken from containers during the inspection show that wastes contained the following hazardous substances: trichlorobenzene (244,000 milligrams per kilogram [mg/kg]), poly-chlorinated biphenyls (PCBs) (774,000 mg/kg) and xylene (369,000 mg/kg). Benzene was detected in most of the samples as well as in the Site soils. Samples also exhibited a pH of 1.68 standard units, ignitability of 14 degrees Fahrenheit, a Toxicity Characteristic Leaching Procedure (TCLP) value of 636 milligrams per liter (mg/L) for chlorobenzene and 0.22 mg/L for vinyl chloride

## **Vinyl Chloride**

Vinyl chloride can affect the liver, nerves and immune system. The Department of Health and Human Services has classified vinyl chloride as a carcinogen.

## **Xylene**

Exposure to xylene can cause headaches, lack of muscle coordination, and dizziness. Exposure can also affect the respiratory system and can cause changes in the liver and kidneys.

### **Actual or potential contamination of drinking water supplies or sensitive ecosystems;**

A creek flows along the northern perimeter of the fenced-in portion of the Site property. There is a non-contact cooling water outfall on-Site (that was permitted) that allows for discharges into the nearby creek. It is unknown, however, whether the underground storage tanks and interior pits are connected to this system which (if connected) can release the chlorinated oils into the creek which eventually drains to the Olentangy River. An area on the east side of the property has stressed vegetation and analytical results indicate the soils in that area contain benzene. This area is located less than 100 feet from the creek that runs along the perimeter of the Site.

### **Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;**

The facility is abandoned and as such is subject to adverse weather conditions. Rain could enter into the storage tanks located outdoors causing them to overfill and release their contents to the nearby soils and creek. The unlocked building could become compromised due to neglect and rainwater could overflow the interior machine pits, thereby releasing chlorinated oils into the environment. Lightning could strike the facility, tanks or many drums that contain flammable liquid, and, thus, could cause a fire on-Site.

### **High Levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;**

There is stressed vegetation on the east side of the Site indicating that the contents of underground storage tanks in the area have leaked. Analytical results of the soils in the area indicate that benzene is present in high concentrations. Historical information suggests that solvent-contaminated soils were excavated and landfarmed across the property.



### **Threat of fire or explosion;**

Many of the containers have flammable liquid labels affixed to them. The Site is susceptible to trespass as evidenced by the presence of fast food wrappers and recreational trails throughout the property. Ohio EPA documented shotgun shells on the property indicating that someone may have been shooting firearms at or on the property which could ignite the drums of flammable material.

### **The availability of other appropriate Federal or state response mechanisms to respond to the release;**

On April 23, 2012, Ohio EPA requested U.S. EPA's assistance in mitigating the potential threats at the Taylor Industrial Services Site. Ohio EPA and Morrow County have indicated they do not have the resources to perform a cleanup of the Site. See Confidential Enforcement Addendum for additional information.

### **Other situations or factors that may pose threats to public health or welfare of the United States or the environment;**

Although the Site is fenced, there are large gaps in the fence that allow for easy access. The Site is an attractive nuisance for local teens and the County can no longer afford 24-hour security services at the Site. In addition, the open machine pits present a physical hazard for trespassers. Historical information suggests that soil contaminated with solvents was landfarmed across the property. Trails are evident along piles of the suspected material on-Site which indicates that the local population uses the property for recreational purposes.

## **IV. ENDANGERMENT DETERMINATION**

Given the Site conditions, the nature of the suspected hazardous substances, pollutants or contaminants on-Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances, pollutants or contaminants from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

## **V. EXEMPTION FROM STATUTORY LIMITS**

Section 104 (c) of CERCLA, as amended by SARA limits the Federal emergency response to \$2 million unless three criteria are met. The quantities and levels of hazardous substances at the Taylor Industrial Services Site warrant the \$2 million exemption based on the following factors:

**A) There is an immediate risk to public health or welfare or the environment;**

The Site is located in a mixed industrial and residential neighborhood. Trespassing occurs at the Site on a regular basis, and although fencing is present around the portion of the Site that was used for manufacturing and where the wastes are stored, there are large gaps in the fence which facilitates trespass. Security is not present on-Site and Ohio EPA documented shotgun shells on-Site near some containers of hazardous waste. During a Site walk the OSC observed people using the unfenced portion of the Site for recreational purposes.

Most of the contaminants are contained in drums or tanks that are in varying condition. A large portion of the wastes (chlorinated oils) were dumped in open machine pits located inside the unlocked building. There is also a drainage system for the Site that discharges directly to a nearby creek and it is unknown whether the pits are connected to the system.

**B) Continued response actions are immediately required to prevent, limit, or mitigate an emergency;**

The continued presence of hazardous substances at the Site constitutes an imminent threat to human health, welfare, and the environment. The effects of wind and rain on the contaminated soils, oil, and unsecured drums constitute a threat of release that, if left unmitigated, could impact the environment and surrounding residential neighborhoods.

**C) Assistance will not otherwise be provided on a timely basis;**

In a letter dated April 23, 2012, Ohio EPA requested that U.S. EPA assist the state by conducting a time-critical removal action at the Taylor Industrial Services Site. Morrow County had been providing security services until late 2011 when it could no longer afford to maintain the services. Neither Ohio EPA nor any local government has adequate resources to conduct a time-critical removal action of this magnitude.

**VI. PROPOSED ACTIONS AND ESTIMATED COSTS**

**A. Proposed Actions Taken**

**1. Action description**

Removal activities on Site will include:

- a) Develop and implement a Site Health and Safety Plan and Site Security Plan;
- b) Characterize and dispose of all hazardous substances, materials, pollutants or contaminants located at the facility, including but not limited to material contained in drums, tanks or other storage containers;

- c) Excavate and dispose of contaminated soils located near the underground storage tanks;
- d) Render unusable all large storage tanks and/or remove from the Site;
- e) Remove and dispose of PCB-contaminated electrical transformers and other electrical equipment;
- f) Decontaminate stained areas on the ground where the contents of containers have leaked;
- g) Fill open pits (inside and outside of the facility) with clean material;
- h) Decontaminate heavy equipment as necessary, and appropriately dispose of decontamination water;
- i) Remove and plug the drain system leading to the creek;
- j) Assess landfarmed soils and dispose of the material as appropriate;
- k) Take any necessary response action to address any release or threatened release of a hazardous substance, pollutant or contaminant that U.S. EPA determines may pose an imminent and substantial endangerment to the public health or the environment;

Post Removal Site Controls - The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP. Elimination of all threats presented by hazardous substances and/or pollutants or contaminants in the building is, however, expected to minimize the need for post-removal Site control.

Off-Site Rule - All hazardous substances, pollutants or contaminants removed off-Site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

## **2. Contribution to remedial performance:**

The proposed action will not impede future actions based on available information.

## **3. Engineering Evaluation/Cost Analysis (EE/CA)**

Not Applicable

#### **4. Applicable or Relevant and Appropriate Requirements (ARARs)**

All applicable, relevant, and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable considering the exigencies of the circumstances.

Federal  
RCRA Subtitle C

State

On June 22, 2012, EPA asked Mr. Randy Ohlemacher of Ohio EPA via electronic mail to identify any State of Ohio ARARs which may apply.

#### **5. Project Schedule**

The removal activities are expected to take 90 on-Site working days to complete; if contaminated landfarmed soils are discovered, however, additional time will be required to complete the removal action.

#### **6. Disproportionate Funding**

The response actions described in this memorandum directly address the actual or threatened release at the Site from hazardous substances, pollutants or contaminants, which may pose an imminent and substantial endangerment to public health, welfare, or the environment. EPA does not believe that these response actions will impose a disproportionate burden on the affected property.

#### **B. Estimated Costs**

The detailed cleanup contractor cost is presented in Attachment 2 and the Independent Government Cost Estimate is presented in Attachment 3. Estimated project costs are summarized below:

REMOVAL ACTION PROJECT CEILING ESTIMATE	
<b><u>Extramural Costs:</u></b>	
<b><u>Regional Removal Allowance Costs:</u></b>	
Total Cleanup Contractor Costs (This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes a 20% contingency)	\$1,891,721
<b><u>Other Extramural Costs Not Funded from the Regional Allowance:</u></b>	
Total START, including multiplier costs	\$ 116,759
Total Decontamination, Analytical & Tech. Services (DATS)	\$ 0
Total CLP	\$ 0
Subtotal	\$ 116,759
Subtotal Extramural Costs	\$2,008,480
Extramural Costs Contingency (20% of Subtotal, Extramural Costs rounded to nearest thousand)	\$ 401,696
<b>TOTAL REMOVAL ACTION PROJECT CEILING</b>	<b>\$2,410,176</b>

**VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

Contamination may migrate from the Site to the nearby creek if action is delayed or not taken. Furthermore, delayed action may increase the risk to the environment and animal populations if the hazardous substances and/or pollutants or contaminants in the affected waste streams are not addressed. The local human population could be exposed to the hazardous substances, pollutants or contaminants through trespass or if a fire were to occur at the facility due to the ignition of flammable liquids found at the Site.

**VIII. OUTSTANDING POLICY ISSUES**

None

**IX. ENFORCEMENT**

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total U.S. EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$3,975,583.<sup>1</sup>

$$(\$2,410,176 + \$50,000) + (62.76\% \times \$2,460,176) = \$4,004,182$$

## X. RECOMMENDATION

This decision document represents the selected removal action for the Taylor Industrial Services Site, located at 820 West Marion Road, Mt. Gilead, Morrow County, Ohio. It was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the Site (Attachment 4). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed removal action.

The total removal action project ceiling if approved will be \$2,410,176. Of this, an estimated \$2,293,417 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE  DATE: 9/19/2012  
Director, Superfund Division

DISAPPROVE \_\_\_\_\_ DATE: \_\_\_\_\_  
Director, Superfund Division

### Enforcement Addendum

Figure:

A-1: Photo Log

### Attachments

1. Environmental Justice Analysis
2. Detailed Cleanup Contractor Cost Estimate
3. Independent Government Cost Estimate
4. Administrative Record Index

<sup>1</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

cc: S. Fielding, U.S. EPA 5202 G (email: Sherry Fielding/DC/USEPA/US)  
C. Valencia, U.S. Department of Interior, **w/o Enf. Addendum**  
(email: valencia\_darby@ios.doi.gov)  
Lindy Nelson, U.S. DOI, w/o Enf. Addendum  
(Email: lindy\_nelson@ios.doi.gov)  
Scott Nally, Director, OEPA, w/o **Enf. Addendum**  
(email: scott.nally@epa.state.oh.us)  
Mike DeWine, Ohio Attorney General, **w/o Enf. Addendum**  
(email: Mike.DeWine@ohioattorneygeneral.gov)

ENFORCEMENT ADDENDUM

TAYLOR INDUSTRIAL SERVICES SITE  
MT. GILEAD, MORROW COUNTY, OHIO

ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

(REDACTED 4 PAGES)

ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY



**FIGURE A-1**  
**PHOTO LOG**



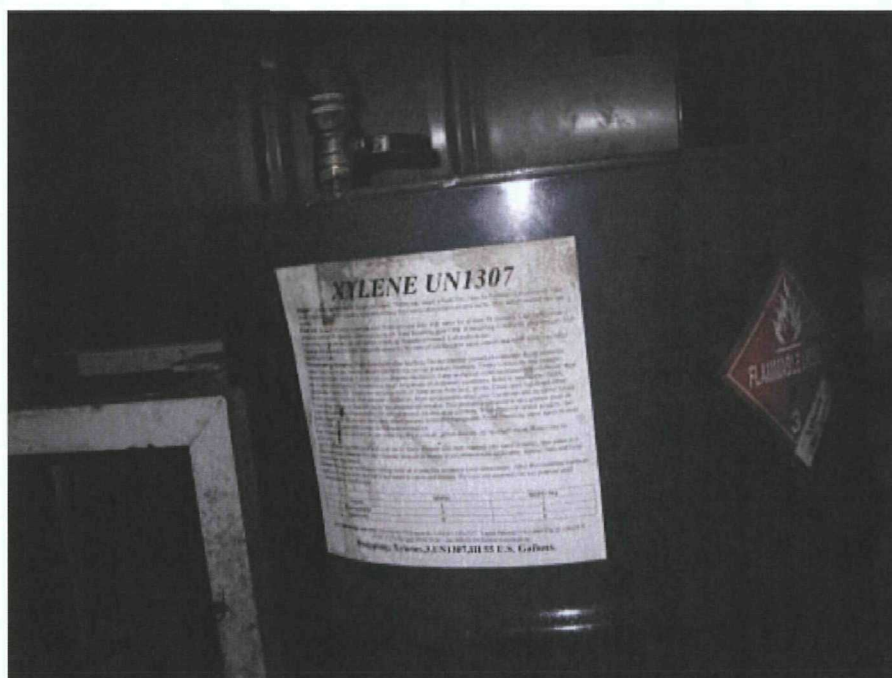
Interior pits filled with petroleum waste.



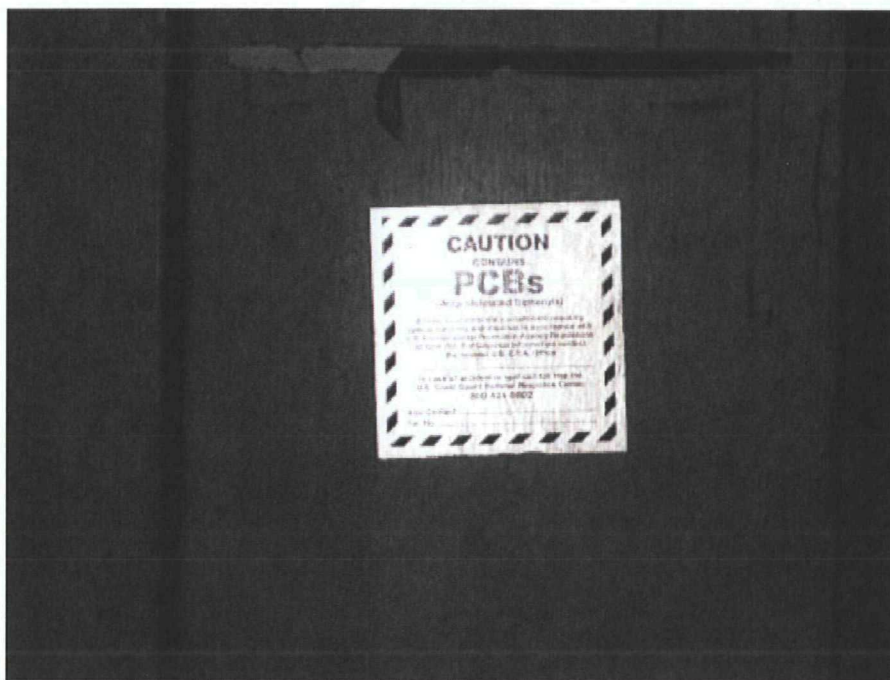
Drums abandoned on site.



Smaller containers abandoned on site.



Close up of one drum indicating it contains xylene.



Close-up of PCB label on interior electrical transformer.



Open and closed view of UST containing chlorinated waste oil.





Staining on concrete around drums abandoned outside.



Material leaking from the top of a storage tank





Bare patch of ground near some USTs. Soil tested positive for leachable benzene.



View of facility discharge.

## ATTACHMENT 1

### **Environmental Justice Analysis Taylor Industrial Services Site Mt. Gilead, OH September 2012**

The area surrounding the Taylor Industrial Services Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ assist Tool (which applies the interim version of the national EJ strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The Taylor Industrial Services Site is in a census tract with a score of 7. Therefore, Region 5 does not consider this to be a high-priority potential EJ area of concern.

#### **Taylor Industrial Services Site Map Showing EJ SEAT Values For Surrounding Area**



## ATTACHMENT 2

DETAILED CLEANUP CONTRACTOR AND START ESTIMATE

TAYLOR INDUSTRIAL SERVICES SITE  
MT. GILEAD, MORROW COUNTY, OHIO

SEPTEMBER 2012

(REDACTED 1 PAGE)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

## ATTACHMENT 3

### INDEPENDENT GOVERNMENT COST ESTIMATE

TAYLOR INDUSTRIAL SERVICES SITE  
MT. GILEAD, MORROW COUNTY, OHIO

SEPTEMBER 2012

(REDACTED 2 PAGES)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION



## ATTACHMENT 4

### U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

#### ADMINISTRATIVE RECORD FOR TAYLOR INDUSTRIAL SERVICES SITE MT. GILEAD, MORROW COUNTY, OHIO

ORIGINAL  
September, 2012

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	07/00/99	ATSDR	Public	ATSDR ToxFAQs for Chloro- benzene	2
2	02/00/01	ATSDR	Public	ATSDR ToxFAQs for Poly- chlorinated Biphenyls	2
3	09/00/05	ATSDR	Public	ATSDR ToxFAQs for Xylene	2
4	07/00/06	ATSDR	Public	ATSDR ToxFAQs for Vinyl Chloride	2
5	08/00/06	ATSDR	Public	ATSDR ToxFAQs for Di- chlorobenzenes	2
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10	03/29/11	Sheldon, R., Ohio EPA	Ohio EPA File	Field Activity Report for the Taylor Industrial Services Facility	2
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